

June 30, 2022

VIA ECF

Hon. Jesse M. Furman  
United States District Judge  
United States District Court for the Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: Bluestone Resources Inc. et al. v. Greensill Capital (UK) Limited et al., Case No. 21-CV-2253 (JMF)**

Dear Judge Furman:

Plaintiffs and Defendants Alexander Greensill and Roland Hartley-Urquhart (the “Individual Defendants”), by and through their undersigned counsel, jointly hereby respectfully request that the stay in this action as to the Individual Defendants entered by order of the Court on September 9, 2021 (Dkt. 43) (the “Stay Order”) and extended by orders of the Court on December 9, 2021 (Dkt. 46), March 11, 2022 (Dkt. No. 49) and May 17, 2022 (Dkt. No. 51) (together, the “Stay Extension Orders”) be extended for an additional 60 days.

As the Court is aware, pursuant to the Stay Order, all deadlines in this case were stayed as to the Individual Defendants following the recognition of Defendant Greensill Capital (UK) Limited’s (“GCUK”) administration proceeding under the United Kingdom’s Insolvency Act of 1986 as a foreign main proceeding pursuant to Chapter 15 of the Bankruptcy Code by the U.S. Bankruptcy Court for the Southern District of New York on September 10, 2021, including a stay of the deadline for the Individual Defendants to answer or otherwise respond to the Complaint until December 20, 2021, which deadline was extended by the Stay Extension Orders until July 6, 2022. As the parties noted in their prior joint requests for extensions of the stay, GCUK’s Chapter 15 case remains pending. In addition, since the parties’ last joint extension request, as a result of constructive discussions, Plaintiffs have entered into a settlement agreement with certain other parties, including Greensill Bank AG, which provides, among other things, for the dismissal of this action with prejudice. The effectiveness of that settlement, however, is subject to the approval of the U.S. Bankruptcy Court for the Southern District of New York presiding over the Chapter 15 case of Greensill Bank AG, which approval is anticipated in the coming weeks. Therefore, Plaintiffs and the Individual Defendants submit that an extension of the stay as to the Individual Defendants would serve judicial efficiency.

Accordingly, Plaintiffs and the Individual Defendants respectfully request that all deadlines in this case remain stayed as to the Individual Defendants for an additional 60 days, including extension of the following deadlines:

	<u><b>Current Deadline</b></u>	<u><b>New Deadline</b></u>
Individual Defendants to answer or move to dismiss the Amended Complaint:	July 6, 2022	September 7, 2022
Plaintiffs to oppose any motion to dismiss filed by Individual Defendants:	September 2, 2022	November 1, 2022
Individual Defendants to file replies in support of motions to dismiss:	September 23, 2022	November 22, 2022

Plaintiffs and the Individual Defendants also request that the initial pretrial conference remain adjourned *sine die* as provided in the Stay Order.

Respectfully submitted,

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cc: Laura R. Hall (by ECF)